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May 1, 2025

Via ECF

SO ORDERED. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 7.

Arun Subramanian, U.S.D.J.
Date: May 2, 2025

Hon. Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, New York 10007

Re: **Letter Motion for Extension of Responsive Deadline -** *Fernandez v. Gainful Health, Inc.,* **No. 25-2696 (S.D.N.Y.)**

Dear Judge Subramanian:

This firm is counsel to Defendants Gainful Health, Inc. (Gainful). We write jointly with Plaintiff Jacqueline Fernandez (Plaintiff) to move for an extension of Gainful's responsive deadline from May 1, 2025 to May 31, 2025.

On April 1, 2025, Plaintiff filed a Complaint against Defendant in the above-captioned matter, which was served upon Gainful on April 10, 2025, giving Gainful a responsive deadline of May 1, 2025. However, Counsel for Gainful was only recently retained and, following a meet and confer, the parties have agreed to the proposed extension to allow Gainful sufficient time to review the file, investigate the claims, and prepare an appropriate response. Gainful has requested no previous extensions. The reason for this request is to ensure that newly retained defense counsel has adequate time to evaluate the case and meaningfully engage in early discussions that may narrow the issues or facilitate resolution. This extension will not impact any other scheduled dates, including the current initial pretrial conference with on July 2, 2025 at 3:00 p.m. which is the parties next scheduled appearance before the Court.

We appreciate the Court's consideration of this request. Should Your Honor have any questions or require additional information, we are available at the Court's convenience.

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP   STEIN SAKS, PLCC

/s/ Adam Sgro   */s/ Rami Salim*
Adam Sgro   Rami Salim
Jacob M. Harper *(Pro Hac Vice Forthcoming)*
Daniel Imakyure *(Admission Application Pending)*

cc: All parties via ECF